



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

May 10, 2005

Ms. Kathleen E. Hain, Manager
U.S. Department of Energy
Idaho Operations Office
1955 Fremont Ave., M/S 1222
Idaho Falls, ID 83402-1510

Re: Request to place WAG 9 ANL-04 Sewage Lagoons in OU 10-08 for
Administrative Control

Dear Ms. Hain:

EPA has completed its review of your request to transfer the sewage lagoons at the site formerly known as Argonne to the Operable Unit (OU) 10-08 as discussed in your March 7 letter. We agreed to this approach during a Project Manager call in March and responded in the affirmative via email. This letter represents a formal response for the files.

After reviewing DOE's request, EPA concurs that ANL-04, the sewage lagoon site, should be transferred to OU 10-08. There are several reasons for this. As you noted, the sewage lagoons are still in use and will remain so for a long time. When the ROD was signed it was anticipated that these lagoons would be out of service and available for remediation, which is not now the case. As an active site, the lagoons are covered with water. Thus, the risk pathway for ecological receptors is not complete. Accordingly, the lagoons do not present a risk to the environment in their current state.

Also, all other remedial work at the site is complete. To delay issuing the final remedial action report until the lagoons are remediated would result in the report being written after most of the people involved in the cleanup are not around and thus most of the institutional knowledge of the cleanup would be lost.

EPA supports placing ANL-04 under OU 10-08. The integrated site-wide five year review will ensure that institutional controls are maintained and will note that ANL-04 "was not remediated" and was placed under OU 10-08. The final ROD for INL, currently planned to be OU 10-08, will incorporate the remedial action selected for ANL-04.

If you have any questions regarding this letter, please call Matt Wilkening, the manager for OU 9-04 site, at 208/378-5760.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Ceto". The signature is fluid and cursive, with the first name "Nicholas" written in a larger, more prominent script than the last name "Ceto".

Nicholas Ceto, Program Manager
INL Project

cc: Daryl Koch, DEQ Regional Office
Scott Lee, MFC
Margie English, DEQ Regional Office
Matt Wilkening, EPA-IOO